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7821 Havenside Terrace  
Rockville, MD 20855

March 16, 2001

FDA Commissioner  
Dockets Management Branch (HFA 305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Docket No. 00N-1396 and 00D-1598  
Dear FDA Commissioner:

I am writing in response to the FDA's proposed new rule and guidance on genetically engineered foods. I strongly oppose FDA's proposed voluntary labeling and notification proposals in support of all the points in the citizens' petition currently before the agency (Docket No. 00N-1396 and 00D-1598).

When I was a boy in the 50's, I remember reading article after glowing article claiming that a new age of electrical abundance and cheap transportation was coming. These conditions were going to be brought about by nuclear technology. Nuclear generated electricity was going to be "too cheap to meter". Nuclear powered cars, airplanes, spaceships, and even vacuum cleaners were going to revolutionize our life style.

What happened? The negative side effects of nuclear exposure, explosions, and waste were simply not anticipated. We made some grave mistakes by assuming that we knew all about the technology, when in fact we knew very little, especially about its long term consequences. As a result, the nuclear industry is now a pariah.

I believe the situation is now the same with genetic engineering as it was with nuclear energy in the 1950's.

Like nuclear energy, genetic engineering is a manipulation of the environment at a level which is fundamentally different and deeper than anything that came before it. If we have learned anything from our experience with nuclear energy, we should first study the long term effects of genetic engineering before we assume that we know enough to use it.

There are two reasons why it is even *more* important that we be careful with genetic engineering: (1) we are eating these foods, not just exposing ourselves to it; and (2) the effects of a mistake will not be localized either in space or in time.

I strongly believe that:

(1) All GE foods must at least be labelled. Failure to require labelling of GE foods is an attempt to withhold critical information from the consumer.

(2) GE foods should not be "generally recognized as safe" until they are proven safe by long term testing.

00D-1598

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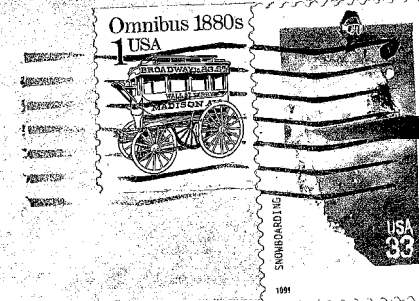
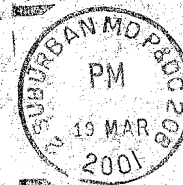
If there should ever be any widespread problem with GE foods, history will judge you very harshly for failure to exercise common sense preventive safety measures. Don't let the biotech firms railroad you into hasty action that you may regret later.

Thank you for taking this input into account in your decision.

Sincerely,

  
Kevin Carmody

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